

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NORMA SHAPIRO, individually and in her
capacity as Trustee for the Norma Shapiro
Revocable Declaration of Trust Under Agreement
Dated 9/16/2008 and the Trust Under Will of Philip
L. Shapiro; NORMA SHAPIRO DECLARATION
OF TRUST UNDER AGREEMENT DATED
9/16/2008, REVOCABLE TRUST; TRUST
UNDER WILL OF PHILIP SHAPIRO; and
MARTIN ROSEN, in his capacity as Trustee of the
Trust Under Will of Philip L. Shapiro,

Defendants.

Adv. Pro. No. 10-04486 (CGM)

**STIPULATION AND ORDER ADJOURNING DEADLINES FOR
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Norma Shapiro, individually and in her capacity as Trustee for the Norma Shapiro Revocable Declaration of Trust Under Agreement

Dated 9/16/2008 and the Trust Under Will of Philip L. Shapiro, Norma Shapiro Declaration of Trust Under Agreement Dated 9/16/2008, Revocable Trust, Trust Under Will of Philip Shapiro, and Martin Rosen, in his capacity as Trustee of the Trust Under Will of Philip L. Shapiro (“Defendants”) by and through their counsel, Carole Neville and Arthur Ruegger of Dentons US LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

WHEREAS, on March 23, 2021, this Court entered an Order Setting Deadlines for Trustee’s Motion for Summary Judgment [Dkt. 109] (the “Order”); and

WHEREAS, the Parties have reached a settlement in principle resolving the above-captioned adversary proceeding

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein:

1. The deadlines set forth in the Order are hereby adjourned *sine die* to allow the Parties to complete the settlement by June 4, 2021;
2. As soon as practicable after the settlement is finalized, the Parties shall file a Stipulation and Order for Voluntary Dismissal of this Adversary Proceeding.

Dated: New York, New York
May 25, 2021

Of Counsel:

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

/s/ Carole Neville

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Attorneys for Defendants

SO ORDERED.

**Dated: May 28, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**